

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

**TOWERS WATSON & CO. n/k/a WTW
DELAWARE HOLDINGS LLC,**

Plaintiff,

V.

Civil Action No. 1:20-cv-00810

**NATIONAL UNION FIRE
INSURANCE COMPANY OF
PITTSBURGH, PA, FEDERAL
INSURANCE COMPANY, U.S.
SPECIALTY INSURANCE
COMPANY, TRAVELERS
CASUALTY AND SURETY
COMPANY OF AMERICA, LIBERTY
INSURANCE UNDERWRITERS INC.,
ALLIED WORLD NATIONAL
ASSURANCE COMPANY, and
IRONSHORE INDEMNITY INC.,**

Defendants.

TOWERS WATSON & CO.'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Plaintiff, Towers Watson & Co. n/k/a WTW Delaware Holdings LLC (“Towers Watson”), by counsel, pursuant to 28 U.S.C. § 2201, Rule 56(a) of the Federal Rules of Civil Procedure, and Local Civil Rules 7(F) and 56, hereby moves for summary judgment against Defendants National Union Fire Insurance Company of Pittsburgh, Pa. (“AIG”), Federal Insurance Company (“Chubb”), U.S. Specialty Insurance Company (“U.S. Specialty”), Travelers Casualty and Surety Company of America (“Travelers”), Liberty Insurance Underwriters Inc. (“Liberty”), Allied World National Assurance Company (“Allied World”), and Ironshore Indemnity Inc (“Ironshore”) (collectively, “Defendants” or “Insurers”) for the reasons stated in

its Memorandum in Support filed contemporaneously with this motion and incorporated herein by reference.

WHEREFORE, Towers Watson respectfully requests that this Court enter a judgment declaring the rights and obligations of the parties under the Policies, including, but not limited to, the following:

- (a) that certain underlying lawsuits brought against Towers Watson fall within the scope of the insuring agreements of the insurance policies sold by and are not otherwise excluded by the defenses Defendants have raised to bar coverage;
- (b) that the coverage defenses raised by Defendants would not bar coverage for a settlement or judgement in these certain underlying actions;
- (c) that this Court provide such further and supplemental relief as it deems necessary and proper, including, but not limited to, an award of costs in favor of Towers Watson.

Respectfully Submitted,

Dated: August 6, 2020

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